

# **EXHIBIT 3**

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June 3, 2021

**VIA EMAIL**

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**Re: Maxell's Smart Phone Related Patents**

Dear Mr. Clarke and Mr. Renke,

I write to follow-up on my various correspondence with Ms. Tsirigotis. As you may know, I had invited to host Lenovo in our Chicago or North Carolina offices to discuss whether Lenovo and Maxell can discuss an amenable resolution to authorize the Motorola line of products that were purchased by Lenovo under Maxell's smartphone patent portfolio. I was disappointed to not receive a reply to the invitation. I would like to invite Lenovo again to discuss a mutually beneficial intellectual property transaction between Lenovo and Maxell in good faith. Please let us know as soon as possible when you are available for a meeting.

As a result of our detailed analysis of Motorola's products, including recent models, we believe that Lenovo would benefit from extending a license to Maxell's smartphone patent portfolio to cover these products. Since my last invitation to you to discuss this matter, the value of Maxell's patents has increased substantially as more devices, such as Motorola's line of smartphones, have adopted more and more features and functionalities covered by Maxell's patents. This has borne out through Maxell's recent licensing and litigation successes. Specifically, all the litigations identified as "pending" in my letter of May 17, 2018 have now been resolved with very favorable results for Maxell. For example, the ZTE litigation resulted in a \$43.3 million verdict on seven patents in its portfolio, including U.S. Patent Nos. 6,748,317 ("317 Patent"); 8,339,493 ("493 Patent"); 8,736,729 ("729 Patent"); 6,408,193 ("193 Patent"); 6,329,794 ("794 Patent"); 6,816,491 ("491 Patent"); and 8,098,695 ("695 Patent"). Further, Maxell's patents were also at issue in additional litigation against Apple. *See Maxell, Ltd. v. Apple Inc.*, C.A. No. 5:19-CV-00036-RWS (E.D. Tex.); *Maxell, Ltd. v. Apple Inc.*, C.A. No. 6:21-CV-

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00158-ADA (W.D. Tex.); *In the Matter of Certain Mobile Electronic Devices And Laptop Computers*, Inv. No. 337-TA-1215; and numerous foreign proceedings in Germany and Japan. The Apple litigation also resulted in a favorable settlement shortly after jury selection.

Moreover, in addition to the 50 patents identified in the May 17, 2018 correspondence, we also call your attention to the following U.S. patents that are incorporated in Motorola's smartphones and related hardware and software products:

No.	U.S. Pat. No.	Claims	Accused Product(s)	No.	U.S. Pat. No.	Claims	Accused Product(s)
1	7,139,533	1, 18	Motorola Razr, Edge, G, One, E series phones	61	10,529,372	1-6, 16-21, 31-36	Motorola Razr, Edge, G, One, E series phones
2	10,349,030	15-28	Motorola Razr, Edge, G, One, E series phone	62	6,697,563	5, 10	Motorola Razr, Edge, G, One, E series phones
3	7,196,986	1, 3, 4	Motorola Razr, Edge, G, One, E series phones	63	10,389,978	1, 2, 8	Motorola Razr, Edge, G, One, E series phones
4	10,244,284	1-20	Motorola Razr, Edge, G, One, E series phones	64	10,854,237	1-7, 14, 19, 27, 32	Motorola Razr, Edge, G, One, E series phones
5	7,104,444	1, 3	Motorola Razr, Edge, G, One, E series phones; Motorola moto360 smartwatches	65	8,130,284	1-8	Motorola Razr, Edge, G, One, E series phones
6	8,139,927	1-4	Motorola Razr, Edge, G, One, E series phones	66	8,724,962	1, 2	Motorola Razr, Edge, G, One, E series phones
7	8,599,244	1, 8, 14	Motorola Razr, Edge, G, One, E series phones	67	8,214,459	1-2	Motorola Razr, Edge, G, One, E series phones
8	7,047,052	2	Motorola Razr, Edge, G, One,	68	8,311,389	3-4, 7-8	Motorola Razr, Edge,

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No.	U.S. Pat. No.	Claims	Accused Product(s)	No.	U.S. Pat. No.	Claims	Accused Product(s)
			E series phones				G, One, E series phones
9	10,264,456	1-3, 5-20	Motorola Razr, Edge, G, One, E series phones, Motorola moto360 smartwatches	69	7,362,952	1, 10, 14	Motorola Razr, Edge, G, One, E series phones
10	7,577,417	1, 2	Motorola Razr, Edge, G, One, E series phones	70	8,477,850	1, 16, 17, 18, 20	Motorola Razr, Edge, G, One, E series phones
11	7,054,649	1	Motorola Razr, Edge, G, One, E series phones; Motorola moto360 smartwatches	71	8,504,544	1-2	smartphones Lenovo Tab P and M series tablets
12	7,187,374	1	Motorola Razr, Edge, G, One, E series phones	72	8,549,109	1-5	Motorola Razr, Edge, G, One, E series phones
13	6,816,444	4, 10	Motorola Razr, Edge, G, One, E series phones	73	8,644,684	1-2	Motorola Razr, Edge, G, One, E series phones
14	8,156,077	1, 10, 15, 20	Motorola Razr, Edge, G, One, E series phones	74	7,562,231	1-3	Motorola Razr, Edge, G, One, E series phones
15	8,112,503	1, 9	Motorola Razr, Edge, G, One, E series phones	75	10,911,719	1-14	Motorola Razr, Edge, G, One, E series phones
16	10,176,848	8-11, 13-20	Motorola Razr, Edge, G, One, E series phones	76	8,892,688	1-8	Motorola Razr, Edge, G, One, E series phones

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No.	U.S. Pat. No.	Claims	Accused Product(s)	No.	U.S. Pat. No.	Claims	Accused Product(s)
17	10,915,220	1, 7	Motorola moto360 smartwatches	77	7,508,760	2	Motorola Razr, Edge, G, One, E series phones
18	9,099,154	1	Motorola Razr, Edge, G, One, E series phones	78	9,083,942	1, 4, 7, 10, 13, 16, 19, 22	Motorola Razr, Edge, G, One, E series phones
19	8,526,791	1, 8, 15	Motorola Razr, Edge, G, One, E series phones	79	10,210,904	1, 7, 12, 18	Motorola Razr, Edge, G, One, E series phones
20	9,942,483	1, 8	Motorola Razr, Edge, G, One, E series phones	80	9,124,758	1-4, 6-17	Motorola Razr, Edge, G, One, E series phones
21	6,940,494	1-11	Motorola Razr, Edge, G, One, E series phones	81	9,197,917	9-16, 25-48	Motorola Razr, Edge, G, One, E series phones
22	7,084,757	1, 5	Motorola Razr, Edge, G, One, E series phones	82	9,313,295	1, 5-10, 13-14, 17-18	Motorola Razr, Edge, G, One, E series phones
23	10,685,681	1, 8, 14, 21	Motorola Razr, Edge, G, One, E series phones	83	8,255,679	1, 7	Motorola Razr, Edge, G, One, E series phones
24	9,704,389	1, 5	Motorola Razr, Edge, G, One, E series phones	84	9,418,704	1-10	Motorola Razr, Edge, G, One, E series phones; Lenovo Tab P and M series tablets
25	10,423,769	1-15	Motorola Razr, Edge, G, One, E series phones; Motorola	85	8,334,933	1	Motorola Razr, Edge, G, One, E series phones

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No.	U.S. Pat. No.	Claims	Accused Product(s)	No.	U.S. Pat. No.	Claims	Accused Product(s)
			moto360 smartwatches				
26	10,298,737	1, 3	Motorola Razr, Edge, G, One, E series phones	86	9,432,618	1-8	Motorola Razr, Edge, G, One, E series phones
27	7,113,909	1, 2, 6-7, 12-13	Motorola Razr, Edge, G, One, E series phones; Motorola moto360 smartwatches	87	6,987,978	1, 5	Motorola Razr, Edge, G, One, E series phones; Lenovo Tab P and M series tablets, Motorola moto360 smartwatches
28	10,511,757	1-8	Motorola Razr, Edge, G, One, E series phones	88	7,293,294	17-20	Motorola Razr, Edge, G, One, E series phones
29	7,084,880	1, 14, 16	Motorola Razr, Edge, G, One, E series phones	89	7,158,770	1, 7	Motorola Razr, Edge, G, One, E series phones; Motorola moto360 smartwatches
30	7,421,188	1-9	Motorola Razr, Edge, G, One, E series phones	90	9,661,101	1-12	Motorola Razr, Edge, G, One, E series phones
31	8,289,450	2	Motorola Razr, Edge, G, One, E series phones	91	10,747,832	1	Motorola Razr, Edge, G, One, E series phones; Motorola moto360 smartwatches
32	10,462,278	1-17	Motorola Razr, Edge, G, One,	92	9,773,522	13-14, 16-17, 19-20, 22-23	Motorola Razr, Edge,

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No.	U.S. Pat. No.	Claims	Accused Product(s)	No.	U.S. Pat. No.	Claims	Accused Product(s)
			E series phones				G, One, E series phones
33	7,245,293	1-3	Motorola Razr, Edge, G, One, E series phones	93	9,818,449	1-16	Motorola Razr, Edge, G, One, E series phones
34	7,248,743	1, 7	Motorola Razr, Edge, G, One, E series phones	94	9,159,368	1-5	Motorola Razr, Edge, G, One, E series phones
35	7,719,417	1	Motorola Razr, Edge, G, One, E series phones	95	16/883,124 (allowed)	1, 9, 16, 21	Motorola Razr, Edge, G, One, E series phones
36	7,312,791	1-7	Motorola Razr, Edge, G, One, E series phones	96	8,005,960	1, 3	Motorola Razr, Edge, G, One, E series phones
37	7,639,706	1, 2, 4	Motorola Razr, Edge, G, One, E series phones	97	6,484,034	1, 8-9	Motorola Razr, Edge, G, One, E series phones
38	7,952,645	1, 3, 4	Motorola Razr, Edge, G, One, E series phones	98	7,072,673	1-4, 9, 15	Motorola Razr, Edge, G, One, E series phones
39	7,464,170	1	Motorola Razr, Edge, G, One, E series phones	99	9,723,268	1-4	Motorola Razr, Edge, G, One, E series phones
40	10,418,069	1, 6-12	Motorola Razr, Edge, G, One, E series phones	100	10,084,991	1-16	Motorola Razr, Edge, G, One, E series phones
41	7,584,431	1	Motorola Razr, Edge, G, One, E series phones	101	9,066,058	1, 2, 4, 5	Motorola Razr, Edge, G, One, E series phones
42	10,645,424	1, 7	Motorola Razr, Edge, G, One,	102	9,369,761	1, 2, 5-6, 9	Motorola Razr, Edge,

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No.	U.S. Pat. No.	Claims	Accused Product(s)	No.	U.S. Pat. No.	Claims	Accused Product(s)
			E series phones				G, One, E series phones
<b>43</b>	7,551,209	1-6	Motorola Razr, Edge, G, One, E series phones	<b>103</b>	8,571,392	1-6	Motorola Razr, Edge, G, One, E series phones
<b>44</b>	7,613,383	1-4	Motorola Razr, Edge, G, One, E series phones	<b>104</b>	10,057,371	1-12	Motorola Razr, Edge, G, One, E series phones
<b>45</b>	7,626,498	1-22	Motorola moto360 smartwatches	<b>105</b>	10,070,099	1, 6	Motorola Razr, Edge, G, One, E series phones
<b>46</b>	10,199,072	1, 6, 11, 16	Motorola Razr, Edge, G, One, E series phones	<b>106</b>	10,129,590	1-10	Motorola Razr, Edge, G, One, E series phones
<b>47</b>	16/260,879 (allowed)	1	Motorola Razr, Edge, G, One, E series phones	<b>107</b>	10,212,586	1-3, 6-11, 13-20	Motorola Razr, Edge, G, One, E series phones; Motorola moto360 smartwatches
<b>48</b>	10,728,362	1, 7	Motorola Razr, Edge, G, One, E series phones	<b>108</b>	10,783,228	1-6, 12-17	Motorola Razr, Edge, G, One, E series phones; Motorola moto360 smartwatches
<b>49</b>	8,566,890	1	Motorola Razr, Edge, G, One, E series phones	<b>109</b>	10,812,646	1-8, 13-20	Motorola Razr, Edge, G, One, E series phones
<b>50</b>	9,154,545	1, 4, 7	Motorola Razr, Edge, G, One, E series phones	<b>110</b>	10,834,459	1-13	Motorola Razr, Edge, G, One, E series phones



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No.	U.S. Pat. No.	Claims	Accused Product(s)	No.	U.S. Pat. No.	Claims	Accused Product(s)
51	9,154,003	1, 7, 14, 15	Motorola Razr, Edge, G, One, E series phones; Motorola moto360 smartwatches	111	10,757,344	1, 3	Motorola Razr, Edge, G, One, E series phones
52	10,679,674	1, 9, 17, 23	Motorola Razr, Edge, G, One, E series phones	112	9,503,648	1-8	Motorola Razr, Edge, G, One, E series phones
53	9,032,438	2	Motorola Razr, Edge, G, One, E series phones	113	7,391,964	1, 9, 11, 19	Motorola Razr, Edge, G, One, E series phones
54	8,180,198	1, 6	Motorola Razr, Edge, G, One, E series phones	114	9,721,462	1, 9, 11	Motorola Razr, Edge, G, One, E series phones
55	15/898,351 (allowed)	1, 5	Motorola Razr, Edge, G, One, E series phones	115	8,111,263	1, 12	Motorola Razr, Edge, G, One, E series phones
56	10,050,474	1, 4, 5, 6, 11	Motorola Razr, Edge, G, One, E series phones	116	9,774,776	1, 3, 4, 5, 7-10	Motorola Razr, Edge, G, One, E series phones
57	7,283,671	1, 19	Motorola Razr, Edge, G, One, E series phones	117	9,591,261	1, 5, 10	Motorola Razr, Edge, G, One, E series phones
58	10,726,159	1	Motorola Razr, Edge, G, One, E series phones	118	16/080,313 (allowed)	1	Motorola moto360 smartwatches
59	10,467,515	1	Motorola Razr, Edge, G, One, E series phones	119	10,635,962	1	Motorola Razr, Edge, G, One, E series phones
60	8,099,136	1	Motorola Razr, Edge, G, One,				

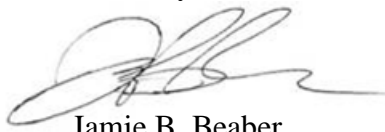
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No.	U.S. Pat. No.	Claims	Accused Product(s)	No.	U.S. Pat. No.	Claims	Accused Product(s)
			E series phones				

These patents are directed to technologies, including imaging/camera components, image processor, proximity sensors, touch screen, power management, wireless communications including Bluetooth, WiFi, NFC, and cellular communications, biometric authentication, positioning, user interfaces, and content management incorporated in Motorola smartphones and smartwatches and related hardware and software sold in the United States. Copies of each of these patents may be found by visiting the United States Patent and Trademark office website, [www.uspto.gov](http://www.uspto.gov).

I will be handling this discussion on behalf of Maxell as the duly authorized representative of Maxell and can be reached by email at [jbeaber@mayerbrown.com](mailto:jbeaber@mayerbrown.com). I look forward to conducting a meeting with you as soon as possible.

Sincerely,



Jamie B. Beaber